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8 Attorney for Robert Guy Russell

9
10 **UNITED STATES DISTRICT COURT**
11
12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 ROBERT GUY RUSSELL,

17 Defendant.

18 Case No. 2:20-cr-00059-APG-DJA

19 **STIPULATION TO CONTINUE**
20 **SENTENCING**
(First Request)

21 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
22 Trutanich, United States Attorney, and Simon F. Kung, Assistant United States Attorney,
23 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
24 and Brian Pugh, Assistant Federal Public Defender, counsel for Robert Guy Russell, that the
25 Sentencing Hearing currently scheduled on February 16, 2021 at 9:30 am, be vacated and
26 continued to a date and time convenient to the Court, but no sooner than ninety (90) days.

27 This Stipulation is entered into for the following reasons:

28 1. The defendant is attempting to gather documents for probation, including but
29 not limited to medical records, to assist in its preparation of the presentence
30 investigation report. The holidays and the impact of COVID-19 have slowed
31 the process of obtaining the records.

1 2. Counsel for the defendant needs additional time to conduct investigation in this
2 case which is relevant to the sentencing and disposition.
3 3. Defendant is not incarcerated and does not object to a continuance.
4 4. The parties agree to the continuance.

5
6 This is the first request for continuance filed herein.

7 DATED this 4th day of January 2021.

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9 RENE L. VALLADARES
10 Federal Public Defender

11 NICHOLAS A. TRUTANICH
12 United States Attorney

13 By /s/ Brian Pugh
14 BRIAN PUGH
15 Assistant Federal Public Defender

16 By /s/ Simon F. Kung
17 SIMON F. KUNG
18 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
ROBERT GUY RUSSELL,
Defendant.

Case No. 2:20-cr-00059-APG-DJA

ORDER

ROBERT GUY RUSSELL,
Defendant.

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Sentencing Hearing currently scheduled on February 16, 2021 at the hour of 9:30 a.m., be vacated and continued to June 1, 2021 at the hour of 10:30 a.m. in Courtroom 6C.

DATED this 6th day of January 2021.

UNITED STATES DISTRICT JUDGE